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Attorneys for Debtors and Reorganized Debtors

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case, No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**DECLARATION OF CRAIG E. JOHNSON IN
SUPPORT OF REORGANIZED DEBTORS'
THIRTY-SECOND SECURITIES CLAIMS
OMNIBUS OBJECTION (INSUFFICIENT
SUBSTANTIVE ALLEGATIONS AND
VOLUNTARY RELEASE CLAIMS)**

Date: February 27, 2023

Time: 10:00 a.m. (Pacific Time)

Place: (Tele/Videoconference Appearances
Only)

United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

1 I, Craig E. Johnson, hereby declare that the following is true and correct to the best of my
2 knowledge:

3 1. I am a Senior Director of Solicitation and Issuer Services at Kroll Restructuring
4 Administration LLC (formerly known as Prime Clerk) (for purposes of this Declaration, “**Kroll**”).

5 2. I am providing this Declaration in support of the *Reorganized Debtors’ Thirty-*
6 *Second Securities Claims Omnibus Objection (Insufficient Substantive Allegations And Voluntary*
7 *Release Claims)* (the “**Omnibus Objection**”).¹

8 3. Kroll has been asked by PG&E Corporation and Pacific Gas and Electric Company,
9 as debtors and reorganized debtors (collectively, the “**Debtors**” or the “**Reorganized Debtors**,”
10 as applicable) and their counsel to assist with reviewing and analyzing the securities claims filed
11 in the Chapter 11 Cases.

12 4. Except as otherwise indicated herein, all facts set forth in this Declaration are based
13 upon my personal knowledge, the knowledge of other employees working under and alongside me
14 on this matter, my discussions with the Reorganized Debtors’ personnel and the Reorganized
15 Debtors’ various advisors and counsel, and my review of relevant documents and information. If
16 called upon to testify, I would testify competently to the facts set forth in this Declaration. I am
17 authorized to submit this Declaration on behalf of the Reorganized Debtors.

18 **Identification of Claims Subject to the Plan Release**

19 5. In accordance with the Plan Solicitation Order, entered by the Court on March 17,
20 2020, Kroll distributed copies of the Disclosure Statement and Solicitation Procedures, applicable
21 ballots, confirmation hearing notices, and other applicable notices and materials that were included
22 in the solicitation packages to creditors and interest holders. The ballot process commenced on
23 March 30, 2020, and was substantially completed on or about April 8, 2020.

24 6. The distribution included ballots directed to different classes of claimants and each
25 titled “Optional Release Election” (the “**Optional Release Election Ballot**”). The Optional

26 ¹ Capitalized terms used but not otherwise defined herein have the meanings ascribed to such terms
27 in the Omnibus Objection.

1 Release Election Ballot offered claimants the opportunity to opt into the releases contained in
2 Section 10.9(b) of the Plan.

3 7. Pursuant to the vote tabulation process set forth in detail in the *Declaration Of*
4 *Christina Pullo Of Prime Clerk LLC Regarding Solicitation Of Votes And Tabulation Of Ballots*
5 *Cast With Respect To the Debtors' And Shareholder Proponents' Joint Chapter 11 Plan Of*
6 *Reorganization* [Dkt. No. 7507], the Kroll team, of which I was a senior member at the time and
7 under my general supervision, solicited votes from, and validated and tabulated ballots returned
8 by, claimants in connection with the Plan balloting process described above.

9 8. Based on this process, we identified that the Claimants listed in **Exhibit 1** to the
10 Omnibus Objection voted to affirmatively and voluntarily opt into the releases contained in Section
11 10.9(b) of the Plan. Those ballots can be submitted at the request of the Court.

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1 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true
2 and correct to the best of my knowledge, information, and belief.

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4 Executed December 13, 2023 in New York.

5
6 /s/ Craig E. Johnson

Craig E. Johnson

7 Senior Director of Solicitation and Issuer Services
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